

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

FATHERS & DAUGHTERS NEVADA, )  
LLC, ) Civil Action No.: 3:16-cv-1443-SI  
*Plaintiff* )  
v. )  
 )  
Lingfu ZHANG ) AGREEMENT TO SATISFY  
*Defendant* ) JUDGMENT AND MUTUAL RELEASE  
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 )  
 )

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WHEREAS, Fathers & Daughters Nevada, LLC (“F&D”) and Lingfu ZHANG (“ZHANG”) have been engaged in litigation that terminated in ZHANG’s favor with an Order and Judgment entered the District Court for the District of Oregon, and F&D has commenced an appeal of the Order, the parties now wish to resolve all disputes and obligations existing between them as follows:

1. ZHANG will serve debtor-discovery Requests for Production (RFPs), Interrogatories, and deposition notices (including third-party RFPs and depositions) on F&D’s counsel shortly. No discovery may be served on any third party unless and until the time at which Zhang is permitted to move to compel under paragraph four below. Time to

respond will run normally, except that Zhang may not move to compel any discovery except as set out in paragraph four below.

2. ZHANG will not attach assets, garnish wages, or perform any other acts of execution or in preparation for execution, or move to compel responses to discovery when the time has run, provided that:
  - a. F&D pays \$20,000.00 by law-firm trust check or wire transfer to ZHANG's counsel by 10 August 2018
  - b. F&D pays \$9135.90 by law-firm trust check or wire transfer to ZHANG's counsel by 25 September 2018
  - c. F&D pays \$9135.90 by law-firm trust check or wire transfer to ZHANG's counsel by 25 October 2018
  - d. F&D pays \$9135.90 by law-firm trust check or wire transfer to ZHANG's counsel by 25 November 2018
3. F&D may prepay any amounts due without penalty.
4. Unless F&D has paid the full amount due of \$47,407.70, failure to pay within five days of any of the September, October or November dates will permit Zhang to declare the discovery overdue and to file a motion to compel. Failing to make the first payment will result in debtor discovery (including the initial batch of requests), asset identification and attachment, garnishment and so on proceeding apace.
5. Immediately upon F&D's payment(s) totaling \$47,407.70, all discovery served by ZHANG will be deemed withdrawn, and the parties will each be relieved of any further liability or obligation to the other, as follows:

Effective upon complete and timely payment, the parties release and discharge each other and their related entities, relatives, predecessors, successors, assigns, officers, directors, members, attorneys, agents, and employees from any and all

claims, demands, causes of action, obligations, and liabilities of every kind and nature whatsoever which each had, or claims to have had, or now has, against the other, which relates to or arises out of any agreements, transactions, events or circumstances occurring prior to the date of execution of this Agreement. It is further understood and agreed that each party hereby agrees that this a general release, which does not extend to claims which the creditor does not know or suspect to exist in his or her favor at the time of executing the release which, if known by him or her must have materially affected his or her settlement with the debtor.

The foregoing paragraphs recite the full and complete terms of this Agreement, which is effective as of August 10, 2018.

*/s John Mansfield* 8/7/18  
John Mansfield Date  
Attorney for Fathers and Daughters Nevada,  
LLC

David MADDEN  
Attorney for Lingfu ZHANG